# EXHIBIT B

Page 1

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

HARRY T. COLLINS,

Plaintiff,

V.

Civil Action
No. 05-624-SLR
WARDEN RAPHAEL WILLIAMS and

Defendants.

Deposition of HARRY T. COLLINS, taken pursuant to notice at the offices of the Delaware Department of Justice, 820 N. French Street, 6th Floor, Wilmington, Delaware, beginning at 10:01 a.m., on Monday, November 19, 2007, before Debra A. Donnelly, Registered Professional Reporter and Notary Public.

### APPEARANCES:

ERIKA Y. TROSS, ESQUIRE
DELAWARE DEPARTMENT OF JUSTICE
820 N. French Street, 6th Floor
Wilmington, Delaware 19801
for Warden Raphael Williams

CORRECTIONAL MEDICAL SYSTEMS,

JAMES E. DRNEC, ESQUIRE
BALICK & BALICK, LLC
711 King Street
Wilmington, Delaware 19801
for Correctional Medical Systems

CORBETT & WILCOX
REGISTERED PROFESSIONAL REPORTERS
230 N. MARKET STREET WILMINGTON, DELAWARE 19801
(302) 571-0510
Corbett & Wilcox is not affiliated
with Wilcox & Fetzer, Court Reporters

## 2 (Pages 2 to 5)

	Page 2	2	Page 4
1	HARRY T. COLLINS,	1	Q. Yes. So if you need to take a break just
2	having been first sworn on oath, was	2	because you want to stop for a moment or you would like
3	examined and testified as follows:	3	to use the restroom, please let me know, and we will
4		4	accommodate you.
5	MS. TROSS: This is a deposition of	5	I will give you time at the end to add
6	Harry T. Collins, SBI No. 00156625, in the case Harry	6	anything you think we didn't cover.
7	Collins vs. Linda Hunter, Warden Raphael Williams and	7	And I need to know if you are taking any
8	Correctional Medical Systems, Civil Action No. 06-624.		medication or drugs which cloud your judgment or preve
9	EXAMINATION	وا	you from giving honest answers to my questions?
10	BY MS. TROSS:	10	A. No.
11	Q. Mr. Collins, as I stated to you earlier, my	11	Q. Okay. Let's talk a bit about your history.
12	name is Erika Tross. I represent Warden Raphael	12	Can you state your full name for the
13	A. Civil Action No. 05-624-SLR.	13	record?
14	Q. I'm sorry, that's correct. Thank you for	14	A. Harry T. Collins.
15	correcting me.	15	Q. Have you used any other names or aliases?
16	Mr. Collins, as I stated to you earlier,	16	A. Yes.
17	my name is Erika Tross. I represent State Defendant	17	Q. Could you tell me those other names, please?
18	Warden Raphael Williams in the matter.	18	A. Right offhand, I'm not exactly sure.
19	And I'm going to let Mr. Drnec introduce	19	Q. Have you ever gone by the name Clarence
20	himself for the record.	20	Shupe
21	MR. DRNEC: James Drnec for Correctional	21	A. Yes, I have.
22	Medical Services, Inc.	22	Q S-H-U-P-E?
23	BY MS. TROSS:	23	Just to remind you, we need to speak one
24	Q. I'm going to explain to you a little bit about	24	at a time for the sake of the court reporter.
·			
	Page 3		Page 5
1	the deposition process.	1	What about the name Tom Cruz, C-R-U-Z?
2	A. All right,	2	A. Yes.
3	Q. It's part of discovery. It's a series of	3	Q. Thomas Cruse, C-R-U-S-E?
4	questions where your answers are being given under oath	4	A. I'm not sure.
5	and are subject to the laws relating to perjury.	5	Q. You are not sure?
6	You can object to any question I ask,	6	Thomas Cosner, C-O-S-N-E-R, have you
7	but you still must answer the question.	7	ever gone by that name?
8	The court reporter will be taking down	8	A. Yes.
9	all of my questions and all of your answers, so we can't	9	Q. Thomas Swan, S-W-A-N, have you ever
10	speak at the same time, because she can only take down	10	A. I'm not sure.
11	what is being said. So we need to speak one at a time.	11	Q. You're not sure about that name?
12	And all your responses must be verbal. You can't nod	12	Have you ever gone by any nickname or
13	your head or say uh-huh, you have to say yes or no if the	13	street name?
14	question requires a yes or no answer.	14	A. Tom.
15	I will assume that if you answer a	15	Q. The T in your name, what does that stand for?
16	question, you've understood the question. So if you	16	A. Thomas.
17	don't understand the question, please let me know, and	17	Q. I see you brought some items with you to this
18	I'll either try to rephrase it or explain what I'm asking	18	deposition.
19	for.	19	Are those documents that have been
20	You are allowed to take breaks. If you	20	produced in this case?
21	need to take a break to use the restroom	21	A. Yes.
22	A. How long does this take?	22	Q. Is there anything that you have with you that
23	Q. It's going to take, I would say, a few hours.	23	you haven't produced to the defendants in this case?
24	A. A few hours?	24	A. No. Yes.
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2007		Page	4 of	6		
	3	(Pag	ges	6	to	9)
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lid you a gton Hig as the la: ation? a Mr. S again? a Mr. S	th. st fu	ıll-time	job yo	u he	ld prio	
ng were y ight year illars a d currentl	s. 1 ay.	made a				- 25
have any	chi	ldren?				
ins, who is Raphael Williams? e warden of the prison. n prison? Hill.						
he name -	Ho	ward Y	oung, v	will	you	
ll. n the sai ll.	ne a	as Gand	er Hill	?		
				E	age	9
give me	a ph	ysical d	escript	ion	of	
ver seen ever had ver had a	dao	conversa	ation w	ith l	ıim?	
						8

1 Q. Where did you attend the 8th grade? 2 A. Medical files, before and after, 3 Q. Did you receive a copy of the State 4 defendants' interrogatories and request for production of 5 documents in this case? 6 A. Not sure. 7 Q. Okay. We will talk a little bit about those 8 later. 9 Have you ever been deposed before? 10 A. What's that mean? 11 Q. What ware for a file of the state of the prison. 12 A. No. 13 Q. Have you ever been deposed before? 14 A. No. 15 Q. Have you ever gone through this before? 16 A. No. 17 Q. Have you ever gone through this before? 18 this one? 19 A. No. 10 Q. Have you ever testified in court before? 10 A. No. 11 Q. Have you ever filed a civil lawsuit besides this one? 12 A. No. 13 Q. Have you ever filed a civil lawsuit besides this one? 14 A. No. 15 Q. Have you ever filed a civil lawsuit besides this one? 16 A. No. 17 Q. What is your date of birth? 21 A. 103/3/58. 22 Q. Where were you born? 23 A. Wilmington, Delaware. 24 Q. Did you also grow up in Wilmington? 25 A. Fifteen years, off and on. 26 Q. Who did you live with prior to that? 27 A. Fifteen years, off and on. 28 Avenue? 29 A. Fifteen years, off and on. 20 Q. Who did you live with prior to that 4 Who did you live with prior to that 5 A. Divmed a Mr. Softee truck. Ice cream business. 6 D. Say that again? 7 A. Jowned a Mr. Softee truck. Ice cream business. 8 business. 8 business. 9 Q. How long were you in the ice cream business. 10 A. About eight years. Imade anywhere bew to suniness. 11 A. No. 12 Q. Have you ever testified in court before? 13 A. No. 14 Q. Do you have any children? 15 A. Three. 16 Q. Mr. Collins, who is Raphael Williams? 18 A. Yes. 19 A. Yes. 20 P. Frior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that? 10 Q. Have you ever had a conversation with him A. I have never seen this man before in my life or prior to that? 11 A. Mother. 12 Q. What is your highest level of education? 12 A. Fifteen years, off and on. 13 A. Bighth grade. Do you want to know what my IQ 14 A.		
2 A. Medical files, before and after. 3 Q. Did you receive a copy of the State 4 defendants interrogatories and request for production of documents in this case? 6 A. Not surc. 7 Q. Okay. We will talk a little bit about those later. 10 A. What's that mean? 11 Q. What we're doing now. 12 A. No. 13 Q. Have you ever been deposed before? 14 A. No. 15 Q. Have you ever gone through this before? 16 A. No. 17 Q. Have you ever gone through this before? 18 disc one? 19 A. No. 17 Q. Have you ever filed a civil lawsuit besides this one? 19 A. No. 19 Q. What is your date of birth? 21 A. 103/58. 22 Q. Where were you born? 23 A. Wilmington, Delaware. 24 Q. Did you also grow up in Wilmington? 25 A. 21 It Harding Avenue, H-A-R-D-I-N-G. 26 Wilmington, Delaware, 19804. 7 Q. How long were you are sident at Harding Avenue? 9 A. Fifteen years, off and on. 10 Q. Who did you live with prior to that 11 current incarceration? 12 A. Mother. 13 A. Mother. 14 Who did you live with prior to that 15 current incarceration? 16 A. Mother. 17 Q. What is your highest level of education? 18 A. Eighth grade. Do you want to know what my IQ is is? 20 Q. No, thank you. 21 A. 188. I tested out between 146 and 148. 22 Q. Okay. 23 Q. What do you beeved well as full-time job you held to you rinearceration of the want again. 24 What is your defended by about those in the power will a conversation with this min in my life. 25 A. 21 It Harding Avenue, H-A-R-D-I-N-G. 26 Wilmington, Delaware, 19804. 27 Q. Who did you live with prior to that 28 between what someone personally does and what the intersonable decision on what happens in that prison. And I understand the difference that Mr. Williams answer. 26 Q. No, thank you. 27 Q. No, thank you. 28 A. Have you ever had a conversation with this min in my life. 29 Q. No, thank you. 20 Q. What is your highest level of education? 21 A. Have never seen this man before in my life in the prison. In the prison of the prison. In the prison of the prison of the prison. In the prison of the prison of the prison of the pris	Page 6	Page 8
2 A. Medical files, before and after. 3 Q. Did you receive a copy of the State 4 defendants' interrogatories and request for production of 5 documents in this case? 6 A. Not sure. 7 Q. Okay. We will talk a little bit about those 8 later. 9 Have you ever been deposed before? 10 A. What's that mean? 11 Q. What we're doing now. 12 A. No. 13 Q. Have you ever gone through this before? 14 A. No. 15 Q. Have you ever testified in court before? 16 A. No. 17 Q. Have you ever filed a civil lawauit besides 18 this one? 19 A. No. 10 Q. What is your date of birth? 21 A. 103/58. 22 Q. Where were you born? 23 A. Wilmington, Delaware. 24 Q. Did you also grow up in Wilmington? 25 A. 21 Harding Avenue, H-A-R-D-I-N-G. 26 Wilmington, Delaware, 19804. 7 Q. How long were you arresident at Harding Avenue? 9 A. Fifteen years, off and on. 10 Q. Who did you live with prior to that 11 A. Mother. 12 Q. What is your bighest level of education? 13 A. Ore. 14 A. Mother. 15 C. Linst with prior to that 16 A. Mother. 17 Q. What is your highest level of education? 18 A. Fifteen wars, off and on. 19 Q. Who did you live with prior to that 10 Q. What is your bighest level of education? 11 A. Mother. 12 Q. What is your bighest level of education? 13 A. Mother. 14 Who did you live with prior to that 15 current incarceration? 16 A. Mother. 17 Q. What is your highest level of education? 18 A. Fighth grade. Do you want to know what my IQ 19 is? 20 Q. No, thank you. 21 A. Hals I tested out between 146 and 148. 22 Q. Okay.	vould that be? 1 Q. Where did you	u attend the 8th grade?
Q. Did you receive a copy of the State defendants interrogatories and request for production of documents in this case?  A. Not sure. Q. Okay. We will talk a little bit about those later. Have you ever been deposed before? A. What's that mean? A. No. A. Williams? A. No. A. No. A. No. A. No. A. Williams? A. No. A. Yes, I will. A. Have never bad a conversation with him in impulsive many and any and all questions and debate it and come up with the price of the deven what someone personally dose and what the enphysie		
defendants' interrogatories and request for production of 6 documents in this case?  A. Not sure.  Bater.  Have you ever been deposed before?  A. What's that mean?  Q. What we're doing now.  Lee A. No.  Have you ever gone through this before?  A. No.  Have you ever gone through this before?  A. No.  Have you ever gone through this before?  A. No.  Have you ever gone through this before?  A. No.  Have you ever filed a civil lawsuit besides this one?  A. No.  C. Have you ever filed a civil lawsuit besides this one?  A. No.  C. What is your date of birth?  A. No.  C. What is your date of birth?  A. Wilmington, Delaware.  C. Where were you born?  A. Wilmington, Delaware.  C. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that?  A ves.  Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that?  A ves.  Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that?  A ves.  Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that?  A ves.  Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that?  A ves.  Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that?  A ves.  Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that?  A ves.  Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that?  A ves.  Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that?  A ves.  Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live with prior to that?  A ves.  Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live with prior t		
documents in this case?  A. Not sure.  Q. Okay. We will talk a little bit about those later.  Have you ever been deposed before?  A. What's that mean?  Learning of the word of the prison.  Have you ever gone through this before?  A. No.  Q. Have you ever gone through this before?  A. No.  We will talk a little bit about those later.  A. No.  What's that mean?  What's that mean?  A. No.  What's that mean?  Who didy our date of birth?  A. No.  What's that is your date of birth?  A. Yes, I will.  Page 7  A. Yes, I will.  Page 7  A. Yes, I will.  A. I have never seen this man before in my lift's to mean the same as Gander Hill?  A. Have never had a conversation with him in my lift.  Who did you live with prior to —  Mother.  Q. Under that the difference that Whr. William is responsible for everything hits the fan, he is the one supposed to an any and all questions and debate it and come up wit reasonable decision on what happens in his prison.  A. I have never had a conversation with him is in my lift.  A. I have never seen this man before in my lift.  Q. What is your bighest level of education?  A. Whother.  Q. Una you give me a physical description of warden will inderstand the difference that Whr. William is responsible for everything hits the fan, he is the one supposed to an any and all questions and debate it and come up wit reasonable decision on what		
A   Lowned a Mr. Softee truck. Lee cream business.	i	
A   Lowned a Mr. Softee truck. Ice cream business.		
Bater.   Sample   Have you ever been deposed before?   10		
10 A. What's that mean? 11 Q. What we're doing now. 12 A. No. 13 Q. Have you ever gone through this before? 14 A. No. 15 Q. Have you ever testified in court before? 16 A. No. 17 Q. Have you ever filed a civil lawsuit besides 18 this one? 19 A. No. 20 Q. What is your date of birth? 21 A. 103/58. 22 Q. Where were you born? 23 A. Wilmington, Delaware. 24 Q. Did you also grow up in Wilmington? 25 A. 211 Harding Avenue, H-A-R-D-I-N-G. 26 Wilmington, Delaware, 19804. 27 Q. How long were you a resident at Harding Avenue? 28 Avenue? 29 A. Fifteen years, off and on. 10 Q. Who did you live with prior to that 20 Q. I just need to finish the question before you answer. 21 A. Mother. 22 Q. What is your highest level of education? 23 A. Fighth grade. Do you want to know what my IQ is is? 24 Q. No, thank you. 25 Q. Ar yes, I will. 26 A. A yes, I will. 27 Q. Lave you ever had a conversation with him to responsible for everything hits the fan, he is the one supposed to am any and all questions and debate it and come up wilt reasonable decision on what happens in his prison. In responsible for that. That's what I understand the difference that where were you by warden Williams? 28 A. Eighth grade. Do you want to know what my IQ is is? 29 Q. No, thank you. 20 Q. What do you base Warden Williams authority. 21 A. 14 R. I tested out between 146 and 148. 22 Q. What do you base Warden Williams? 24 A. That's the warden of the prison. 25 A. That's the warden of the prison. 26 Q. Mr. Collins, who is Raphael Williams? 26 A. Yes, I will. 27 Q. That's the warden of the prison. 28 A. Yes, I will. 29 Q. Can you give me a physical description of Warden Williams? 29 A. Fifteen years, off and on. 29 Q. Warden Williams? 29 A. Fifteen years, off and on. 20 Q. Who did you live with prior to that 21 Q. Have you ever had a conversation with him in my life. 29 A. Fifteen years, off and on. 30 A. Fifteen years in the prison. 31 A. I have never bead a conversation with him in my life. 31 A. I have never bead a conversation with him in my life. 32 A. I h	8 business.	
10 A. What's that mean? 11 Q. What we're doing now. 12 A. No. 13 Q. Have you ever gone through this before? 14 A. No. 15 Q. Have you ever filed a civil lawsuit besides 16 A. No. 17 Q. Have you ever filed a civil lawsuit besides 18 this one? 19 A. No. 20 Q. What is your date of birth? 21 A. 103/58. 22 Q. Where were you born? 23 A. Wilmington, Delaware. 24 Q. Did you also grow up in Wilmington? 25 A. Yes. 26 Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to hat? 26 Wilmington, Delaware, 19804. 27 Q. How long were you a resident at Harding Avenue? 28 Avenue? 29 A. Fifteen years, off and on. 10 Q. Who did you live with prior to 11 A. Mother. 12 Q. Ijust need to finish the question before you answer. 13 A. Fighth grade. Do you want to know what my IQ is is? 14 Q. No, thank you. 28 Q. No, thank you. 29 Q. No, thank you. 20 Q. No, thank you. 21 A. 14 A. Aoou currently married? A. No. 22 Q. Ar you currently married? A. No. 24 A. No. 25 Q. Mr. Collins, who is Raphael Williams? A. That's the warden of the prison. 26 Q. Mr. Collins, who is Raphael Williams? A. Gander Hill. Q. If I use the name Howard Young, will you understand that 24 A. Yes, I will. 25 Q to mean the same as Gander Hill? A. Yes, I will. 26 Q. Can you give me a physical description of Warden Williams? A. I have never seen this man before in my life. C. Mr. Collins, do you understand the difference that Mr. William is responsible for everything that happens in that prison. And I understand the difference that what the employees do? A. Inderstand the difference that what the employees do? A. Inderstand the difference that what the employees do? A. Inderstand the difference that what the employees do? A. Inderstand the difference that what the employees do? A. Inderstand the difference that what the employees do? A. Inderstand the difference that what the employees do? A. That's based on his authority. A. A Yes, I will.  A. Yes, I will.  A. I have never had a conversation with thim is in m	you ever been deposed before? 9 Q. How long were	e you in the ice cream business?
11 Q. What we're doing now. 12 A. No. 13 Q. Have you ever gone through this before? 14 A. No. 15 Q. Have you ever testified in court before? 15 A. No. 16 A. No. 17 Q. Have you ever filed a civil lawsuit besides this one? 18 this one? 19 A. No. 20 Q. What is your date of birth? 21 A. 10/3/58. 22 Q. Where were you born? 23 A. Wilmington, Delaware. 24 Q. Did you have any children? A. That's the warden of the prison. 18 Q. Mr. Collins, who is Raphael Williams? A. Gander Hill. Q. If lus the name Howard Young, will you understand that— 22 A. Yes, I will.  Page 7 A. Yes. Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that? A. 211 Harding Avenue, H-A-R-D-I-N-G. Wilmington, Delaware, 19804. Q. How long were you a resident at Harding Avenue? A. Fifteen years, off and on. Q. Who did you live with prior to— A. Mother. Q. I just need to finish the question before you answer. Who did you live with prior to that C. Q. What is your highest level of education? A. Mother. C. Q. What is your highest level of education? A. Mother. C. Q. What is your highest level of education? A. Mother. C. Q. No, thank you. Q. No, thank you. Q. Okay.  12 A. No. Q. Mr. Collins, do large and flow is a thousand dollars a day. A. No. Q. Mr. Collins, who is Raphael Williams? A. That's the warden of the prison. A. That's the warden of the prison. Q. Of which prison? A. That's the warden of the prison. Q. Of which prison? A. That's the warden of the prison. Q. Of which prison? A. That's the warden of the prison. Q. Of which prison? A. That's the warden of the prison. Q. Of which prison? A. That's the warden of the prison. Q. Of which prison? A. That's the warden of the prison. Q. Of which prison? A. That's the warden of the prison. A. That's the warden of the prison. Q. Of which prison? A. That's the warden of the prison. A. That's the warden of the		
13 Q. Have you ever gone through this before? 14 A. No. 15 Q. Have you ever testified in court before? 16 A. No. 17 Q. Have you ever filed a civil lawsuit besides 18 this one? 19 A. No. 20 Q. What is your date of birth? 21 A. 103/5/8. 22 Q. Where were you born? 23 A. Wilmington, Delaware. 24 Q. Did you also grow up in Wilmington? 25 A. Yes. 26 Q. Prior to your incarceration, your most recent on that began on June 14th, where did you live just prior to that? 27 Q. How long were you a resident at Harding Avenue? 28 Avenue? 29 A. Fifteen years, off and on. 20 Q. Who did you live with prior to		
14 A. No. 15 Q. Have you ever testified in court before? 16 A. No. 17 Q. Have you ever filed a civil lawsuit besides this one? 18 this one? 19 A. No. 20 Q. What is your date of birth? 21 A. 10/3/58. 22 Q. Where were you born? 23 A. Wilmington, Delaware. 24 Q. Did you also grow up in Wilmington? 24 A. Yes, I will. 25 Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that? 26 Wilmington, Delaware, 19804. 27 Q. How long were you a resident at Harding Avenue, H-A-R-D-I-N-G. 28 Avenue? 29 A. Fifteen years, off and on. 20 Q. Who did you live with prior to	12 Q. Are you curren	ntly married?
15 Q. Have you ever testified in court before? 16 A. No. 17 Q. Have you ever filed a civil lawsuit besides this one? 18 this one? 19 A. No. 20 Q. What is your date of birth? 21 A. 10/3/58. 22 Q. Where were you born? 23 A. Wilmington, Delaware. 24 Q. Did you also grow up in Wilmington? 25 A. Yes. 26 Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that? 26 Wilmington, Delaware, 19804. 27 Q. How long were you a resident at Harding Avenue? 29 A. Fifteen years, off and on. 20 Q. Who did you live with prior to	ou ever gone through this before? 13 A. No.	
16 A. No. 17 Q. Have you ever filed a civil lawsuit besides this one? 18 this one? 19 A. No. 20 Q. What is your date of birth? 21 A. 10/3/58. 22 Q. Where were you born? 23 A. Wilmington, Delaware. 24 Q. Did you also grow up in Wilmington? 24 A. Yes, I will. 25 Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that? 26 Q. How long were you a resident at Harding Avenue, H-A-R-D-I-N-G. 27 Q. How long were you a resident at Harding Avenue? 28 A. Fifteen years, off and on. 29 Q. Who did you live with prior to 10 Q. Who did you live with prior to that 11 A. Mother. 12 Q. I just need to finish the question before you answer. 14 Who did you live with prior to that 15 current incarceration? 16 A. Mother. 17 Q. What is your highest level of education? 18 A. Eighth grade. Do you want to know what my IQ is? 19 is? 20 Q. No, thank you. 21 A. 148. I tested out between 146 and 148. 22 Q. What do you base Warden Williams? 24 A. That's the warden of the prison. 26 Q. Mir. Collins, who is Raphael Williams? 26 Q. Mr. Collins, who is Raphael Williams? 27 A. That's the warden of the prison. 29 Q. Froir to your gate of birth? 20 Q. Can you give me a physical description of Warden Williams? 3 A. I have never seen this man before in my life Q. Have you ever had a conversation with this m in my life. 3 A. I understand the difference that Mr. William is responsible for everything that happens in that prison. And I understand the difference that when the president of the United States. 3 Q. What is your highest level of education? 4 A. Yes, I will. 4 Q. Can you give me a physical description of Warden Williams? 4 A. I have never seen this man before in my life Q. Have you ever had a conversation with this m in my life. 4 Q. How to long were you a resident at Harding heavener had a conversation with this m in my life. 5 A. I understand the difference that Mr. William is responsible for everything hits the fan, he is the one supposed to an any and all questions and debate it a	14 Q. Do you have at	ny children?
this one?  19 A. No. 20 Q. What is your date of birth? 21 A. 10/3/58. 22 Q. Where were you born? 23 A. Wilmington, Delaware. 24 Q. Did you also grow up in Wilmington?  25 Page 7  1 A. Yes. 26 Q. Prior to your incarceration, your most recent one that began on June 14th, where did you live just prior to that?  4 Prior to that?  5 A. 211 Harding Avenue, H-A-R-D-I-N-G.  6 Wilmington, Delaware, 19804.  7 Q. How long were you a resident at Harding Avenue?  9 A. Fifteen years, off and on.  10 Q. Who did you live with prior to that current incarceration?  11 A. Mother.  12 Q. I just need to finish the question before you answer.  13 A. Mother.  14 Who did you live with prior to that current incarceration?  15 A. Bighth grade. Do you want to know what my IQ is?  16 A. Mother.  17 Q. No, thank you.  28 A. 148. I tested out between 146 and 148.  29 Q. Okay.	ou ever testified in court before? 15 A. Three.	
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22 Q. Okay. 22 Q. What do you base Warden Williams' authori		RE .
123 A Thatlater with C 1 to 100	22 Q. What do you base	
	points away from genius, if you 23 on?	
24 really want to know. 24 A. Like the president of the United States.	w. 24 A. Like the presiden	nt of the United States.

### 4 (Pages 10 to 13)

#### Page 10 Page 12 1 Q. But have you read somewhere what you just 1 I understand that nothing was ever found. 2 described? 2 I understand that the officers that were 3 A. Would I have to? 3 in that mod when this happened were supposed to act upon 4 Q. I'm asking you: Have you read somewhere what 4 theirselves and do something about it, stand up to be 5 you just described? 5 accounted for. But considering the fact that they all 6 A. Assumption. That's usually the way it works, 6 stick together is a reasonable assumption that nothing 7 isn't it, chain of command? 7 would happen about it in the first place. 8 Q. So you are assuming that --8 Q. Are you finished? 9 A. No, I am not assuming anything. I'm -- I'm 9 A. Yes. 10 going by the education that I grew up with. 10 Q. Do you understand that correctional officers 11 Q. But you haven't -must have the ability to take action and make decisions 11 12 A. And what I've learned in the law libraries. 12 without consulting the warden? 13 And Mr. Williams is responsible for whatever happens in 13 A. Not in that extent, no. 14 his prison. 14 Q. So it's your belief that correctional officers 15 Q. So going back to my original question, do you 15 must always ask the warden permission before doing 16 understand the difference between what someone personally 16 something? 17 does and what their employees do? 17 A. No, it's my belief that a correctional officer 18 A. Yes, I do. 18 is always supposed to act in a reasonable manner before 19 Q. What is the difference? 19 taking any type of action given to him, appointed to him. 20 A. The difference is -- I don't understand the 20 Like, they have certain procedures they have to go 21 question. 21 through. That's my belief. 22 Q. For example, do you understand what the warden 22 Q. Do you know what decisions the warden is 23 does, as opposed to what his correctional officers do, do 23 involved in and what decisions he's not involved in? 24 you understand that there is a difference there? 24 A. It's my reasonable assumption that he is Page 11 Page 13 A. Well, I understand that when he finds out what 1 1 involved in all the decisions. 2 they do, he's supposed to make a reasonable assumption 2 Q. And you said that's your assumption? 3 and do something about it, act on his authority. That I 3 A. Yes. 4 understand. 4 Q. What is your assumption based on? 5 Q. Do you understand that --5 Chain of command. 6 A. Which he hasn't done in any of these matters, 6 Q. Is it based on anything that you have read? 7 not to my knowledge. It was never approached to me on 7 A. Some things I have read in the law library, 8 any assumption or belief or anything, for that matter, 8 yes. 9 not even -- nobody has even come to me in writing or said 9 Q. Such as what? 10 anything to me or anything. 10 A. I can't exactly comment on that right at this 11 I understand one of his officers grabbed 11 point in time. 12 me by the throat until I passed out. And I understand 12 Q. Why can't you comment? 13 that, that he -- he damn near strangled me to death, and 13 A. Because I have read a lot of things in the law 14 in order to make up for it, he sent me down the hole for 14 library. I don't know just exactly everything I've read. 15 30 days. I understand that. Just so he could cover his 15 Q. Are you referring to cases that you've read? 16 own back. 16 Are you referring to Department of Correction policies 17 And I understand another thing, too. I 17 that you've read? 18 would like to press charges on this man. The two years 18 A. I think it was something to do with Department 19 is not up yet for an assault, and I would definitely like 19 of Correction policies. 20 to press charges on this man. I have been meaning to 20 Q. Do you remember what those policies are? 21 call you about that for a long time now. 21 A. Not exactly. I couldn't even point them out 22 I understand that I give them in writing 22 to you at this time. 23 the fact of what he done to me, and there was supposed to 23 Q. Well, if you do remember them, either at any 24 be an investigation, their so-called investigation. And time during this deposition or afterwards, if you could

5 (Pages 14 to 17)

			5 (Pages 14 to 17
	Page 14	-	Page 16
1	please let me know what policies you are referring to.	1	INDEX
2	Thank you.	2	
3	A. You make this whole thing out to look like the		DEPONENT: HARRY T. COLLINS PAGE
4	warden is not responsible for anything in what he does.	3	
5	Q. I don't believe I've ever said that to you		Examination by Ms. Tross 2
6	just now.	4	
7	A. It's the questions that you are asking me.	5	EXHIBITS
8	Q. Well, I'm trying to	6	(There were no exhibits marked for identification.)
9	A. That's a reasonable assumption to me right	8	
10	there, that you are saying that you know, this is like	9	
11	a joke. You know what? This is a joke.	10	
12	Q. Mr. Collins, I'm trying to understand why you	11	CERTIFICATE OF REPORTER PAGE 17
13	sued Warden Williams, why you made him a defendant in		INGL!
14	this lawsuit?	13	
15	A. Well, I will tell you what. Let's get him in	14	
16	court and find out then.	15	
17	Q. Mr. Collins, let me tell you that if you	16	
18	choose	17	
19	A. I'm not sitting here for two hours for this in	18	
20	the first place.	19	
21	Q. If you choose not to continue with this, the	20 21	
22	defendants will move to dismiss this case for your	22	
23	failure to prosecute it.	23	
24	A. Let them move to dismiss it, then. Because	24	•
	Page 15		Page 17
1	you know what	1	CERTIFICATE
2	Q. So you are choosing to end this deposition?	_	STATE OF DELAWARE
3	A. Yep. Because these questions you are asking	2	
4	me I think are very threatening.	_	NEW CASTLE COUNTY
5	Q. How have I threatened you?	3	TRI AR H M. ST. ST.
6	A. Because you are just I kind of figured this	4 5	I, Debra A. Donnelly, a Notary Public within and for the County and State aforesaid, do hereby certify that
7	out anyway.	6	the foregoing deposition of HARRY T. COLLINS was take
8	Q. Well, Mr. Collins, I just want you to	7	before me, pursuant to notice, at the time and place
9	understand that the defendants will move to dismiss this	8	indicated; that said deponent was by me duly sworn to
10	case.	9	tell the truth, the whole truth, and nothing but the
11	A. That's all right. Then I will appeal to a	10	truth; that the testimony of said deponent was correctly
12	higher court, Supreme Court, you know. I have no proble	11 m 2	recorded in machine shorthand by me and thereafter transcribed under my supervision with computer-aided
13	with that. And I will get my day in court. Eventually I	13	transcription; that the deposition is a true record of
14	will get my day in court.	14	the testimony given by the witness; and that I am neither
15	MS. TROSS: Okay. The deposition of	15	of counsel nor kin to any party in said action, nor
16	Harry Collins is now over, as Mr. Collins has chosen to	16	interested in the outcome thereof.
17	leave the deposition before it's ended.	17	WITNESS my hand and official seal this day of
18	Do you have anything you would like to	18 19	November A.D., 2007.
19	say for the record?	20	
20	MR. DRNEC: No, I think the record		
21	speaks for itself.	21	DEBRA A. DONNELLY, RPR
22	(Deposition concluded at 10:15 a.m.)		CERTIFICATE #151-PS
23	( spoonwon concluded at 10.15 a.m.)	22	EXPIRATION: PERMANENT
24	- Articular	23	
L		24	